

LAW OFFICES OF  
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August 30, 2024

**VIA ECF**

**MEMO ENDORSED**

Hon. Sidney H. Stein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

Re: *United States v. John Grant*, 21-cr-486(SHS)

Dear Judge Stein,

I represent John Grant in the above-captioned matter. I write to request a 14-day extension for the filing of Mr. Grant's reply papers for the pending 821 motion. The current date for reply is today. This is the first such request. I apologize for the lateness of the submission but as discussed below, I had hoped to speak with Mr. Grant in time to meet the deadline.

I was appointed to represent Mr. Grant on July 24, 2024. At the time Mr. Grant was incarcerated at FCI Lewisburg. My office promptly mailed him a letter informing him of the appointment and scheduled a legal call at the facility for August 15, 2024. The morning of the scheduled call, I was informed that he had been moved to FCI Danbury. My office has made constant efforts to no avail to schedule a legal call with Mr. Grant as soon as possible. As such, I respectfully request a 14-day extension to file Mr. Grant's reply papers.

I thank the Court in advance for its consideration of this matter.

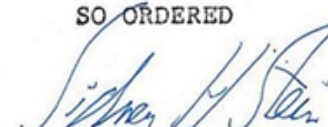
Sincerely,



Daniel McGuinness

**The request for an extension of 14 days to file a reply is granted.  
The reply submission is due on or before September 13.**

**Dated: New York, New York  
August 30, 2024**

SO ORDERED  
  
SIDNEY H. STEIN  
U.S.D.J.